

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
(Chicago Division)**

ASLI BAZ

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Petitioner,

*

Civil No.: 1:23-cv-05017

v.

*

ANTHONY PATTERSON

*

Respondent.

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* * * * * * * * * * * *

PETITIONER'S STATUS REPORT FOR NOVEMBER 1, 2023
PRETRIAL CONFERENCE

Petitioner, Asli Baz, by and through her undersigned counsel, files this Status Report for the November 1, 2023 Telephonic Pretrial Conference, and explains as follows:

- A. The Court previously granted the Respondent permission to file his witness and exhibit lists late, and to exchange his proposed exhibits with the Petitioner's counsel late. All were to be filed/exchanged on Monday, October 30, 2023.
- B. The Respondent did file his witness list containing eight (8) witnesses, and did file a proposed exhibit list on October 30, 2023. The Respondent did not exchange his proposed exhibits as required.
- C. Undersigned counsel immediately followed up with the Respondent regarding his missed exchange of his proposed exhibits. Eventually, but not until after 9:00 P.M., EST on Tuesday, October 31, 2023, the Respondent emailed undersigned counsel his 55 proposed exhibits. The Respondent's proposed exhibits are voluminous and at first blush appear to be subject to numerous objections.
- D. Undersigned counsel is not able to have a meet and confer with the Respondent as required by Local Rules 16 and 16.1 to try to narrow down the Respondent's proposed

witnesses and exhibits and address the Petitioner's objections before the pretrial conference scheduled for this morning, November 1, 2023 at 11:00 A.M. CST. Undersigned counsel believes that they can save the Court and his staff significant time and labor by allowing undersigned counsel to work with the Respondent and to go through with the Respondent his voluminous proposed exhibits and witnesses over the next several days to try to come to an agreed set of trial exhibits.

E. Undersigned counsel therefore respectfully requests the following:

- i. That the Respondent be ordered to work promptly with undersigned counsel to narrow down the Respondent's proposed exhibits and witnesses; and
- ii. That undersigned counsel for the Petitioner then prepare and hand deliver to the Honorable Clerk of this Court on Wednesday, November 8, 2023 the required number of trial binders for *both* parties (and provide sets to the Respondent and his settlement counsel at the same time); and
- iii. In the event that the parties are unable to agree on the number of Respondent's proposed exhibits and witnesses, and are unable to resolve the Petitioner's objections to the Respondent's proposed exhibits and witnesses that the Petitioner may also file any motions in limine on Wednesday, November 8, 2023.

F. Finally, the Petitioner's counsel will promptly update the Court on the outcome of all settlement discussions.

Respectfully Submitted,

/s/ Stephen J. Cullen

Stephen J. Cullen

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of November, 2023, a copy of the foregoing Status Report was electronically filed, and that it is available for viewing and downloading from the ECF system to all counsel of record, and that it has been emailed and also mailed, first-class, postage prepaid, to the pro se Respondent and also to his settlement counsel as follows:

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/s/ Stephen J. Cullen

Stephen J. Cullen